

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

CASE NO: 0:24-cv-60078-WPD

JULIAN LORENZO, on behalf of himself
and all others similarly situated,

Plaintiff(s),

v.

2200 RESTAURANT PARTNERS, LLC
d/b/a DUNE BY LAURENT TOURONDEL

Defendant.

**DECLARATION OF JORDAN RICHARDS, ESQ. IN SUPPORT OF JOINT MOTION
FOR APPROVAL OF INDIVIDUAL FLSA SETTLEMENT AGREEMENTS AND
ORDER OF DISMISSAL WITH PREJUDICE**

I, JORDAN RICHARDS, declare under penalty of perjury that the following information is true and correct:

1. My name is Jordan Richards; I am over the age of 18 years of age, and I am lead counsel for Plaintiffs in this action.
2. I am the owner and managing member of USA Employment Lawyers – Jordan Richards PLLC which is headquartered in Fort Lauderdale, Florida.

Educational Background

3. I am a 2013 graduate of the Benjamin N. Cardozo School of Law at Yeshiva University in New York, New York, and was first admitted to practice law in the State of Florida on January 17, 2014. While attending law school, I served as a law clerk for the Honorable Arlene Bluth of the Supreme Court of the State of New York (civil branch), for the in-house legal department of Screen Actors Guild – American Federation of Television and Radio Artists (“SAG-AFTRA”), for the Kings County (Brooklyn) District Attorney, and for Schwartz & Perry LLP, a New York-based employment law firm. I was admitted to practice law in the State of Illinois in 2018. I was admitted to practice law in the State of New York in 2021.

4. After being admitted to practice law in the State of Florida, and before going into private practice, I served as an Assistant State Attorney with the State Attorney's Office for the 17th Judicial District in Broward County, Florida. As an Assistant State Attorney, I litigated dozens of trials to verdict.

Affiliations and Awards

5. I am a member of the National Employment Lawyers Association ("NELA") and the American Bar Association ("ABA") and have been recognized through peer review as a Super Lawyers Rising Star in 2020, 2021, 2022, and 2023, in the area of Labor and Employment Law and have also been rated AV Pre-Eminent by Martindale Hubbell in the judicial and peer review categories.

Court Admissions

6. I am admitted to practice in all state and federal courts throughout Florida and Illinois, including the United States District Court for the Southern District of Florida, the United States District Court for the Middle District of Florida, the United States District Court for the Northern District of Florida, the United States District Courts for Northern District of Illinois, the United States District Court for the Central District of Illinois, and the United States District Court for the Southern District of Illinois. Additionally, I am admitted to practice in the State of New York. I am also admitted to practice before the Eleventh Circuit Court of Appeals, and the United States Supreme Court, as well as the United States District Court for the District of Colorado, the United States District Court for the District of New Mexico, the United States District Court for the Eastern District of New York, and the United States District Court for the Southern District of New York. I am a member in good standing in each of these bars. I have also appeared as counsel in the Western District of Texas (*pro hac vice*), the Northern District of Georgia (*pro hac vice*), the Northern District of California (*pro hac vice*), the District of Connecticut (*pro hac vice*), the Eastern District of North Carolina (*pro hac vice*), the Western District of Pennsylvania (*pro hac vice*), and the District of Utah (*pro hac vice*).

Relevant Experience and Skill

7. I now litigate almost exclusively in federal court and have litigated many cases to completion. My firm also handles select cases throughout the state and federal courts throughout the country including class and collective action cases involving unpaid wages under the Fair

Labor Standards Act (“FLSA”) Illinois Minimum Wage Law (“IMWL”), Florida Minimum Wage Act (“FMWA”), New York Labor Law (“NYLL”), and other wage and hour laws. My firm also handles select class action cases in Illinois arising under the Biometric Information Privacy Act (“BIPA”). My firm has handled hundreds of wage and hour cases throughout the United States. To date, I have appeared as counsel in over three hundred (300) federal lawsuits throughout the country. The overwhelming majority of these lawsuits pertain to claims arising under the FLSA, IMWL, BIPA, FMWA, and other state and federal employment and/or consumer laws.

8. I have significant experience litigating wage and hour matters in the context of individual lawsuits, class action lawsuits, collective action lawsuits, and arbitrations.

9. I have also served previously as defense counsel in wage and hour matters as well and have defended several FLSA matters to completion.

10. The following are recent cases in which I have served, or am currently serving, as Plaintiff’s counsel in FLSA collective actions and/or class actions: *Tidwell, et. al. v. BWW Southern Hospitality, Inc.*, N.D. Fla. Case No. 5:23-cv-71-AW-MJF at D.E. 58 (June 3, 2024) (granting joint motion for court approval of FLSA settlement agreement); *Pineda v. Hacienda Amigos, LLC*, Case No. 2024-CA-000296 (St. Lucie Cnty., Fla.) (Mar. 6, 2024) (preliminarily approving class action settlement of wage and hour claims for restaurant workers and naming Mr. Richards class counsel); *Mittwol v. Peloton Interactive, Inc.*, W.D. Pa. Case No. 23-156 at D.E. 45 (Jan. 9, 2024) (Hornak, C.J.) (preliminarily approving class action settlement and naming Mr. Richards co-class counsel); *Pineda v. Casa Amigos Mexican Kitchen, LLC*, Case No. 212024-CA-000097 (Indian River Cnty., Fla.) (Mar. 5, 2024) (preliminarily approving class action settlement of wage and hour claims for restaurant workers and naming Mr. Richards class counsel); *Stafford v. Atlanta Restaurant Partners, LLC*, S.D. Fla. Case No. 0:23-cv-61053-LMR at D.E. 79 (Mar. 13, 2024) (Reid, M.J.) (granting preliminary approval of class/collective action settlement and naming Mr. Richards class counsel); *Rodriguez v. Disney Vacation Club Management, LLC*, Case No. 2023-CA-0014120-O (Orange Cnty., Fla.) (Mar. 11, 2024) (granting final approval of class action settlement of wage and hour claims and naming Mr. Richards class counsel); *Windheim v. Lynnhaven Inn, Inc.*, Case No. CACE23015128 (Broward Cnty., Fla.) (Feb. 6, 2024) (granting final approval of FMWA class action settlement and naming Mr. Richards class counsel); *Renton v. 5th Bite of the Apple, LLC*, S.D. Fla. Case No. 0:22-cv-62082-PMH at D.E. 66 (Jan. 23, 2024) (Hunt, M.J.) (granting final approval of class action settlement and naming Mr. Richards class

counsel); *Lam, et. al. v. BVN 16, LLC*, S.D. Fla. Case No. 1:23-cv-21620-CMA at D.E. 53 (Dec. 18, 2023) (Altonaga, C.J.) (granting final approval of collective action settlement and naming Mr. Richards counsel for collective); *Prate, et. al. v. The White Sheep, Inc.*, N.D. Ill. Case No. 1:22-cv-05478 at D.E. 49 (Nov. 7, 2023) (granting final approval of Rule 23 class and collective action settlement and naming Mr. Richards class counsel); *Terry, et. al. v. Hermes Hospitality Group, LLC*, N.D. Ill. Case No. 1:23-cv-01276 at D.E. 23 (Oct. 17, 2023) (granting conditional certification and naming Mr. Richards counsel for collectives); *Windheim v. Nineteen Bar, LLC*, E.D.N.C. Case No. 7:23-cv-1039 at D.E. 25 (Oct. 18, 2023) (granting conditional certification and naming Mr. Richards co-counsel for collectives); *Castro, et. al. v. Medicare Direct, LLC*, S.D. Fla. Case NO. 9:23-cv-80134-Maynard at D.E. 103 (Sept. 12, 2023) (granting final approval of collective action settlement); *Lam, et. al. v. BVN 16, LLC*, S.D. Fla. Case No. 1:23-cv-21620-CMA at D.E. 37 (Sept. 5, 2023) (granting motion for conditional certification of FLSA collective action); *Murphy, et. al. v. Nickels and Dimes Incorporated*, Winn. County Cir. Ct. Case No. 2022-LA-0000112 (Aug. 16, 2023) (granting final approval of class settlement of Illinois Biometric Privacy Act claims and naming Mr. Richards class counsel); *Prate, et. al. v. The White Sheep, Inc.*, N.D. Ill. Case No. 1:22-cv-05478 at D.E. 39 (Aug. 8, 2023) (granting preliminary approval of class action settlement in wage and hour restaurant case); *Laughlin, et. al. v. Fresh-Mex & Co. Corp., et. al.*, Duval Cnty. Cir. Ct. Case No. 2023-CA-1249 (Duval Cnty., Fla.) (July 27, 2023) (granting final approval of wage and hour class action settlement and naming Mr. Richards class counsel); *Alexander, et. al. v. MLCL Group LLC, et. al.*, N.D. Ill. Case No. 1:22-cv-05471 at D.E. 17 (granting conditional certification of FLSA collective comprised of Servers and Bartenders and naming Mr. Richards counsel for collectives); *Windheim, et. al. v. Topsy Joe Corp.*, S.D. Fla. Case No. 0:22-cv-60278-CMA at D.E. 55 (granting final approval of Rule 23 class settlement in wage and hour restaurant case and naming Mr. Richards class counsel); *Sparks, et. al. v. Kyodai Sushi Rock Café, Inc., et. al.*, Clay County Circuit Court Case No. 2022CA001268 (June 8, 2023) (granting final approval of class action wage and hour restaurant claims and naming Mr. Richards class counsel); *Servidori, et. al. v. Nomi Health, Inc.*, M.D. Fla. Case No. 6:22-cv-01475-WWB-DCI at D.E. 51 (April 10, 2023) (granting conditional certification of FLSA collective action and naming Mr. Richards counsel for the collectives); *Conrey, et. al. v. Beach Boys of Ft. Lauderdale, LLC*, S.D. Fla. Case No. 0:22-cv-60843-HUNT (Judge Hunt granting conditional certification of FLSA collective action and naming Mr. Richards as counsel for FLSA collective); *Van Lehn, et.*

al. v. Uncle Al's Sports Café Sunrise, Inc., et. al., S.D. Fla. Case No. 0:22-cv-61628-AHS at D.E. 28 (granting conditional certification of FLSA collective action and naming Mr. Richards counsel for collective); *Grajeda, et. al. v. Verified Moving Pros, et. al.*, S.D. Fla. Case No. 0:22-cv-61471-WPD at D.E. 18 (granting conditional certification of FLSA collective action and naming Mr. Richards counsel for collective); *Tanofsky, et. al. v. American Residential Warranty*, S.D. Fla. Case No. 9:22-cv-81657-RAR at D.E. 63 (granting conditional certification of FLSA collective action and naming Mr. Richards counsel for the collective).

11. I am intimately familiar with wage and hour claims, such as the matter here, and have handled several other cases arising from alleged violations related to employees under various wage and hour laws. *See, e.g., Dix, et. al. v. RCSH Operations, LLC*, M.D. Fla. Case No. 2:20-cv-98-JES-MRM; *Conrey, et. al. v. Beach Boys of Ft. Lauderdale, LLC*, S.D. Fla. Case No. 0:22-cv-60843-MGC; *Rizzolo, et. al. v. Johnny D's Beach Bar & Grill, LLC*, M.D. Fla. Case No. 3:21-cv-628-TJC-LLL; *Sparks v. Kyodai Sushi Rock Café, Inc.*, M.D. Fla. Case No. 3:22-cv-205-MMH-PDB; *Jackson, et. al. v. Daytona Chicken LLC*, M.D. Fla. Case No. 6:19-cv-481-RBD-LHP; *Colvin v. Too Cool Café, LLC*, M.D. Fla. Case No. 6:21-cv-01688-CEM-GJK; *Carr v. Zephyrhills Donuts LLC*, M.D. Fla. Case No. 8:19-cv-02933-MSS-SPF; *Costa, et. al. v. Food Court by Brazilian Depot, Inc.*, S.D. Fla. Case No. 0:15-cv-61613-WJZ; *Tardiff, et. al. v. Mom's Kitchen, Inc.*, S.D. Fla. Case No. 0:19-cv-61316-BSS; *Ross, et. al. v. Bouvier, et. al.*, S.D. Fla. Case No. 0:20-cv-60371-AHS; *Labarbera v. Zin Management Services, LLC*, S.D. Fla. Case No. 0:20-cv-60283-AHS; *Bernier v. Gyromania 4, LLC*, S.D. Fla. Case No. 0:20-cv-61599-WPD; *Newton, et. al. v. P.D.K.N. Holdings, LLC*, S.D. Fla. Case No. 0:20-cv-61599-WPD; *Wicklow v. Belcarra, Inc.*, S.D. Fla. Case No. 0:21-cv-60370-WPD; *Maskley v. Double Mountain Development Ventures, LLC*, S.D. Fla. Case No. 0:21-cv-60371-RS; *Navas, et. al. v. Lobster Bar Grille, LLC*, S.D. Fla. Case No. 0:21-cv-60480-JMS; *Kaufman v. P.D.K.N. Holdings, LLC*, S.D. Fla. Case No. 0:21-cv-61059-PMH; *Reynoso v. 3033 Group, LLC*, S.D. Fla. Case No. 0:21-cv-61131-WPD; *Ozkan v. Kanti Group*, S.D. Fla. Case No. 0:22-cv-60773-RS; *Conrey v. Bagel Way Kosher Way*, S.D. Fla. Case No. 0:18-cv-22795-DPG; *Downing v. News Café, Inc.*, S.D. Fla. Case No. 1:20-cv-20740-KMW; *Acosta v. Dilly Key Restaurant Holding, LLC*, S.D. Fla. Case No. 4:21-cv-10056-LMR; *Ramos v. Dilly Key Restaurant Holding, LLC*, S.D. Fla. Case No. 4:21-cv-10097-JLK; *Kriberney v. Oak and Ember, LLC*, S.D. Fla. Case No. 9:21-cv-81779-WM; *McDaniel v. Euri & Nari LLC*, N.D. Fla. Case No. 4:18-cv-226-MW-CAS.

12. Attached to this declaration is a Firm Resume which outlines the Law Firm's relevant skill and experience in greater detail. *See* Firm Resume attached as **Exhibit 1**.

History of this Case

13. Class Counsel dedicated significant time and resources to the prosecution of these claims on a class-wide basis and engaged in extensive pre-suit investigations prior to filing suit.

14. On January 12, 2024, Plaintiff filed his Complaint for Damages and Demand for Jury Trial ("Complaint") in the United States District Court for the Southern District of Florida, Fort Lauderdale Division, on behalf of himself and others similarly situated. *See* D.E. 1.

15. Plaintiff's Complaint alleges that Defendant violated the Florida Minimum Wage Act, Fla. Stat. § 448.110 ("the FMWA") and Fair Labor Standards Act ("FLSA") by failing to pay restaurant Bartenders and Barbacks applicable minimum wages during their employment at Defendant's restaurant located at 2200 North Ocean Boulevard, Ft. Lauderdale, FL 33305 *Id.*

16. Specifically, Plaintiff alleged that Defendant failed to provide sufficient notice of the tip credit under state and federal law, required Barbacks and Bartenders to spend more than 20% of their workweeks performing non-tipped duties, and required Barbacks and Bartenders to spend more than 30-continuous minutes performing non-tipped work without being paid applicable minimum wage for this work. *See* D.E. 1.

17. On January 30, 2024, Plaintiff, along with opt-in Plaintiffs, William Miller ("Miller") and John Belloise ("Belloise") filed their Consents to Sue under Fair Labor Standards Act. *See* D.E. 8-1; D.E. 8-1; D.E. 10-1.

18. On March 4, 2024, Plaintiff filed his Motion for Conditional Certification of FLSA Collective Action Pursuant to 29 U.S.C. § 216(b). *See* D.E. 14.

19. On March 13, 2024, Opt-in Plaintiff, Christine Stockinger ("Stockinger"), filed her Consent to Sue under the FLSA. *See* 15-1.

20. On August 15, 2024, Stockinger filed a Notice of Withdrawal of her Consent to Joint [D.E. 33] and is no longer a party or participant in this litigation.

21. The Parties then agreed to an early class-based mediation. *See* D.E. 18. The Parties exchanged detailed data concerning the claims and attended mediation with Howard Tescher, Esq. on April 18, 2024. The Parties reached agreement on material terms on 29 U.S.C. § 216(b) settlement of the claims [D.E. 24] and thereafter worked through preparing a settlement term sheet, written agreements, the instant motion, and other related filings.

22. The Parties now present their FLSA Settlement Agreements and General Releases (“Agreements”) to this Court, which they believe is a fair, reasonable, and adequate resolution of a *bona fide* dispute for Lorenzo, Belloise, and Miller, (collectively referred to as “Plaintiffs”). The Parties seek approval of the Agreement, which would resolve the claims of the Plaintiffs. The Agreement satisfies all criteria for settlement approval. Accordingly, the Parties seek approval of the Agreements, and request that this Court enter an Order that grants such relief.

Hourly Rates of Timekeepers on this Case

23. Class Counsel incurred a total of \$90,790.87 in fees and costs based upon a total of 291.05 total hours. *See Exhibit 2* (composite of time sheets maintained by the time keepers in this matter). Class counsel seeks recovery of \$3,000.00 pursuant to the Settlement Agreements.

24. Based on my qualifications and experience, I billed a reasonable hourly rate of \$395.00 per hour when this case started in September of 2023. *See Egan v. Affordable Mechanics of America Inc. and Ohana America Corporation*, M.D. Fla. Case No. 8:23-cv-178-KKM-SPF at D.E. 25 (Jan. 11, 2024) (holding that \$395.00 per hour was reasonable for Mr. Richards’ qualifications and experience); *see, also, Castro v. Medicare Direct, LLC*, S.D. Fla. Case No. 9:23-cv-80134-SMM (Sept. 12, 2023) (holding that \$395.00 per hour was reasonable for Mr. Richards’ qualifications and experience). I have also been previously approved at \$400.00 per hour for work I have performed in FLSA cases in Florida. *See, e.g., Conrey v. Bagel Way Kosher Way, Inc.*, S.D. Fla. Case No. 1:18-cv-22795-DPG (Court approved Mr. Richards’ request for \$400.00 per hour). Other courts in the Southern District of Florida and Middle District of Florida courts have awarded me at \$375.00 and \$350.00 per hour for work I have performed in FLSA cases. *See e.g., Epsilantis v. Scozzari, et. al.*, S.D. Fla. Case No. 2:21-cv-14195-AMC (May 3, 2024); *see, also, Grajeda v. Verified Moving Pros, et. al.*, S.D. Fla. Case No. 0:22-cv-61471-WPD (May 2, 2024); *Navas, et al. v. Lobster Bar Grille, LLC*, S.D. Fla. Case No. 21-cv-60480-JMS; *Nobles v. Electroduct, Inc., et al.*, S.D. Fla. Case No. 0:20-cv-60899-WPD; *Fish v. Ely’s Tire, Inc., et. al.*, S.D. Fla. Case No. 0:19-cv-61068-KMM; *see, also, Jimenez v. Alpine Towing, Inc., et. al.*, S.D. Fla. Case No. 1:19-cv-21643-KMM; *Lovett v. KS Janitorial Services, Inc.*, M.D. Fla. Case No. 8:20-cv-01511-VMC-CPT, at D.E. 21 (August 11, 2020). The Law Firm seeks compensation for a total of **1.84 hours** that I billed which yields reasonable attorney’s fees in the amount of **\$726.80**.

25. In previous years, a Court in the Southern District of Florida awarded another attorney with 8 years of experience \$450.00 per hour as a reasonable hourly rate for the South

Florida legal market. *See, e.g., Ludwin v. Proman*, 2022 WL 82839 (S.D. Fla. Jan. 7, 2022) (Matthewman, M.J.). Another Court in the Southern District of Florida has recently held that there is no reason to limit an attorney's reasonable hourly rate to what would have been reasonable ten (10) years ago. *See, e.g., Levesque v. GEICO*, 2022 WL 1679224 (S.D. Fla. March 11, 2022) (Maynard, M.J.). Another Court in the Southern District of Florida recently approved an FLSA settlement that awarded the plaintiff's counsel \$4,000.00 in reasonable attorney's fees and costs, based on plaintiff's counsel billing at a rate of \$450.00 per hour. *See, e.g., Rosinsky v. Toorist-Tech Solutions, LLC*, 2022 WL 3370790 (S.D. Fla. Aug. 16, 2022) (Williams, J.) affirming and adopting in full *Rosinsky v. Toorist-Tech Solutions, LLC*, 2022 WL 3370790 (S.D. Fla. July 28, 2022) (McAliley, M.J.) (Recommending approval of FLSA settlement where counsel incurred \$5,085.00 in attorney's fees before Defendant ever appeared in case and ultimately received \$4,000.00 under the settlement agreement).

26. Other Courts in the Middle District of Florida have awarded experienced attorneys \$425.00 per hour as a reasonable hourly rate. *See, e.g., Gordon v. Double Eagle of Sarasota, Inc., et. al.*, M. D. Fla. Case No. 8:16-cv-2561-EAK-AEP (June 21, 2019); *Pena v. RDI, LLC*, M.D. Fla. Case No. 8:17-cv-1404-T-AAS (July 10, 2019).

27. My billing entries at the rate of \$395.00 per hour are shown on the attached lodestar. I believe this to be a fair and reasonable hourly rate for FLSA litigation in Florida federal court based upon prior hourly rates awarded to myself and other plaintiffs' attorneys in federal litigation here as well as the skill required in this complex area. Other Florida federal courts have found my billing rates to be "imminently reasonable" based upon the fact that I have previously been awarded \$400.00 per hour by federal courts in Florida. *See Carey v. EWPB LLC*, S.D. Fla. Case No. 9:19-cv-80811-DMM (Judge Middlebrooks finding Mr. Richards' hourly rate to be "imminently reasonable" in light of Judge Gayles having previously awarded \$400 per hour) *citing Conrey v. Bagel Way Kosher Way, Inc.*, S.D. Fla. Case No. 1:18-cv-22795-DPG (Court approved Mr. Richards' request for \$400.00 per hour).

28. Mr. Miller, a senior attorney employed with the Law Firm has 15 years of experience litigating in the Florida federal district courts and likewise billed at an hourly rate of \$395.00 per hour.

29. Attorney Michael V. Miller ("Mr. Miller") is a senior attorney employed at USA Employment Lawyers – Jordan Richards PLLC. Mr. Miller has been employed with USA

Employment Lawyers since April 2023 and is admitted to practice law throughout state courts in Florida, New York, and New Jersey. Mr. Miller is also admitted to practice in the following federal jurisdictions: United States District Court for the Southern District of Florida, the United States District Court for the Middle District of Florida, the United States District Court for the Northern District of Florida, the United States District Court for Northern District of Illinois, the United States District Court for the Southern District of New York, and the United States District Court for the District of New Jersey. Mr. Miller is a member in good standing in each of these bars, and has also appeared *pro hac vice* in the United States District Court for the Western District of Pennsylvania. Mr. Miller has been practicing law for over 15 years and has extensive experience in complex commercial litigation in federal and state courts and has obtained favorable outcomes for employees in wage and hour collective matters arising under the FLSA and similar state laws. Mr. Miller earned his Bachelor of Arts degree in English Literature from University of Central Florida and went on to earn his Juris Doctorate from Nova Southeastern University's Shepard Broad College of Law. Mr. Miller has significant experience litigating FLSA matters and has achieved conditional certification in FLSA collective actions throughout the State of Florida. *See, e.g., Lam, et. al. v. BVN 16, LLC*, S.D. Fla. Case No. 1:23-cv-21620-CMA at D.E. 37; *see, also, Tidwell, et. al. v. BWW Southern Hospitality, Inc.*, N.D. Fla. Case No. 5:23-cv-71-AW-MJF at D.E. 35. Based on his qualifications and experience, the Law Firm seeks compensation for a total of **141.52 hours** billed by Mr. Miller which yields reasonable attorney's fees in the amount of **\$55,900.40**.

30. Attorney Sarah Schaefer ("Ms. Schaefer") was admitted to the Florida Bar in September of 2023 and is also admitted to practice in the United States District Court for the Southern District of Florida. Ms. Schaefer is a graduate of Nova Southeastern University's Shepard Broad College of Law and is now employed as an associate attorney at USA Employment Lawyers. Ms. Schaefer billed a reasonable hourly rate of \$235.00 per hour in this case. The Law Firm seeks compensation for a total of **132.03 hours** billed by Ms. Schaefer while yields reasonable attorney's fees in the amount of **\$31,027.05**.

31. Law Clerk Ahava Livingstone ("Ms. Livingstone") is a 3rd year law student at the University of Miami School of Law. Ms. Livingstone has been employed by the Law Firm as a law clerk since January 2022. Ms. Livingstone has previously worked as a paralegal at various law firms in South Florida. Ms. Livingstone billed a reasonable hourly rate of \$150.00 per hour in this

case. Four years ago, a Southern District of Florida court held that this is a reasonable hourly rate for law clerks employed at USA Employment Lawyers. *See, e.g., Nobles v. Electriduct, Inc.*, 2020 WL 7211695, at *2 (S.D. Fla. 2020) (Snow, M.J.). The Law Firm seeks compensation for a total of **3.4 hours** billed by Ms. Livingstone which yields **\$510.00** in reasonable fees.

32. Charles McGee (“Mr. McGee”) is employed at the Law Firm as a law clerk. Mr. McGee earned his Juris Doctorate from Florida International University College of Law in May 2016. In law school, Mr. McGee was a member of the National Black Law Students Association (NBLSA) where he served as the Pre-Law Co-Director for the Southern Region in 2015 and 2016. Mr. McGee also served as the President of the H.T. Smith Black Law Students Association (BLSA) in Spring 2016. Prior to attending law school, Mr. McGee earned a Bachelor of Criminal Justice from Florida Memorial University where he graduated in August 2013 magna cum laude. Mr. McGee has prior experience working at law firms in South Florida and Georgia. Additionally, while in law school, Mr. McGee interned in the summer of 2015 with the Hon. Patrick A. White in the United States District Court for the Southern District of Florida. Mr. McGee billed a reasonable hourly rate of \$175.00 per hour in this case. The Law Firm seeks compensation for a total of **12.17 hours** billed by Mr. McGee which yields **\$2,129.75** in reasonable fees.

33. The Law Firm’s former legal assistant, Patricia Simo (“Ms. Simo” or “Intake Coordinator”), billed a reasonable hourly rate of \$150.00 per hour in this case. The Law Firm seeks compensation for a total of **0.09 hours** billed by Ms. Simo which yields **\$13.50** in reasonable fees.

34. Attached to this declaration is a Firm Resume which outlines the Law Firm’s relevant skill and experience in greater detail, as well as a history of the Law Firm’s hourly rates which have specifically been approved by the Courts. *See Ex. 1.*

Contemporaneous Time Records

35. Attached hereto as **Exhibit “2”** is a composite of time sheets maintained by the timekeepers in this matter. These time sheets have been kept in the ordinary course of business activities for the Law Firm and are a fair and accurate representation of the originals. I have reviewed the content of these time sheets to ensure their accuracy. Every timekeeper at USA Employment Lawyers – Jordan Richards PLLC is instructed to contemporaneously maintain their time when performing tasks on matters and I ensure that this practice is enforced. Each of the timekeepers submitting billing records in this case have contemporaneously kept track of their

billable hours. I personally oversee the operations at the Law Firm to ensure that this practice is followed.

36. The Law Firm has exercised reasonable billing judgment in performing work on this case. I have ensured that the Law Firm engages in reasonable billing by reviewing prior decisions from the Courts regarding compensable versus non-compensable work, as well as seeing that duplicative work is not performed on matters. I, personally, have reviewed the billing entries and have reduced the total amount of hours for which the Law Firm is seeking actual compensation. In total, the Law Firm incurred \$90,307.50 in reimbursable fees in this case. The Settlement Amount for the attorneys fees represents an \$86,307.50, or ninety-five percent (95.57%) reduction in fees from those actually incurred. The Law Firm also incurred taxable costs under Section 1920 in the amount of \$483.37 which it will be receiving under the settlement agreement. The costs are broken down on the cost ledger attached hereto as **Exhibit "3."**



08/19/2024

Jordan Richards, Esquire

Date



FIRM RESUME

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Introduction:

USA Employment Lawyers is a boutique law firm dedicated to providing zealous representation to clients across the country in class and collective action litigation. The firm focuses its practice on biometric privacy claims, helping employees recover unpaid wages, and other consumer and employment class action matters.

Notable Recent Class and/or Collective Actions for Unpaid Wages:

Lead or Co-Counsel

- *Mittwol v. Peloton Interactive, Inc.*, W.D. Pa. Case No. 2:23-cv-156-MRH at ECF No. 56 (June 5, 2024) (granting final approval of class action settlement of wage and hour claims and appointing Mr. Richards as class counsel).
- *Tidwell v. BWW Southern Mgmt., Inc.*, N.D. Fla. Case No. 5:23-71-AW-MJF at ECF No. 58 (June 3, 2024) (granting final approval of wage and hour settlement for collective comprised of restaurant servers).
- *Huffman v. RRH-Florida LLC*, AAA Case No. 01-23-0003-7514 (Mar. 26, 2024) (preliminarily approving class action settlement of wage and hour claims for restaurant workers and naming Mr. Richards class counsel).
- *Stafford v. Atlanta Restaurant Partners, LLC*, S.D. Fla. Case No. 0:23-cv-61053-LMR (Mar. 13, 2024) (preliminarily approving class action settlement of wage and hour claims for restaurant workers and naming Mr. Richards class counsel).



- *Pineda v. Hacienda Amigos, LLC*, St. Lucie Cnty. Cir. Ct. Case No. 2024CA000296 (Mar. 6, 2024) (preliminarily approving class action settlement of wage and hour claims for restaurant workers and naming Mr. Richards class counsel).
- *Pineda v. Casa Amigos Mexican Kitchen, LLC*, Indian River Cnty. Cir. Ct. Case No. 312024CA000097 (Mar. 5, 2024) (preliminarily approving class action settlement of wage and hour claims for restaurant workers and naming Mr. Richards class counsel).
- *Mittwol v. Peloton Interactive, Inc.*, W.D. Pa. Case No. 2:23-cv-156-MRH (Jan. 9, 2024) (preliminarily approving class action settlement of wage and hour claims for Field Specialists and naming Mr. Richards and Mr. Miller co-class counsel).
- *Lam v. BVN 16, LLC*, S.D. Fla. Case No. 1:23-cv-21620-CMA (Dec. 18, 2023) (granting final approval of FLSA collective action settlement for collective of restaurant workers).
- *Prate v. The White Sheep, Inc.*, N.D. Ill. Case No. 1:22-cv-05478 (Nov. 7, 2023) (granting final approval of class action settlement of wage and hour claims for class of restaurant workers who were allegedly subject to an unlawful tip pool and naming Mr. Richards class counsel).
- *Terry v. Hermes Hospitality Group, LLC*, N.D. Ill. Case No. 1:23-cv-01276 (Oct. 17, 2023) (granting conditional certification of FLSA collective of restaurant workers and naming Mr. Richards counsel for collective).
- *Windheim v. Nineteen Bar, LLC*, E.D.N.C. Case No. 7:23-cv-1039 (Oct. 13, 2023) (granting conditional certification of FLSA collective of restaurant workers and naming Mr. Richards co-counsel for collective).
- *Castro v. Medicare Direct, LLC*, S.D. Fla. Case No. 9:23-cv-80134-SM (Sept. 12, 2023) (granting final approval of collection action settlement for inside insurance sales agents denied overtime compensation).
- *Laughlin v. Fresh-Mex & Co. Corp.*, Duval Cnty. Cir. Ct. Case No. 2023-CA-1249 (July 27, 2023) (granting final approval of wage and hour class action settlement for restaurant workers who were allegedly not provided adequate tip credit notice).
- *Windheim v. Topsy Joe Corp.*, S.D. Fla. Case No. 0:22-cv-60278-CMA (granting final approval of class action settlement in wage and hour restaurant case).
- *Sparks v. Kyodai Sushi Rock Café, Inc.*, Clay Cnty. Cir. Ct. Case No. 2022CA001268 (June 8, 2023) (granting final approval of class action settlement of wage and hour claims for restaurant workers who were allegedly not provided adequate tip credit notice).

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- *Conrey v. Beach Boys of Ft. Lauderdale, LLC*, S.D. Fla. Case No. 0:22-cv-60843-HUNT (July 8, 2022) (granting conditional certification of FLSA collective action and naming Mr. Richards counsel for FLSA collective comprised of servers and bartenders).
- *Tanfosky v. American Residential Warranty*, S.D. Fla. Case No. 9:22-cv-81657-RAR (March 8, 2023) (granting conditional certification of FLSA collective action for call center workers and naming Mr. Richards counsel for FLSA collective).
- *Servidori v. Nomi Health, Inc.*, M.D. Fla. Case No. 6:22-cv-01475-WWB-DCI (Apr. 10, 2023) (granting conditional certification of FLSA collective action comprised of couriers in vehicle reimbursement and non-discretionary commission wage and hour case).

Notable Recent Biometric Information Privacy Act Class Actions:

Lead or Co-Counsel

- *Bird, et. al. v. Kenkris, Inc.*, Jasper Cnty. Cir. Ct. Case No. 2022LA7 (Apr. 11, 2024) (preliminarily approving Illinois biometric privacy class action settlement for 418 class members and naming Mr. Richards class counsel).
- *Griffin v. Timeco Systems, Inc.*, Kankakee Cnty. Cir. Ct. Case No. 2023CH38 (Apr. 1, 2024) (preliminarily approving Illinois biometric privacy class action settlement for 1,407 class members and naming Mr. Richards co-class counsel).
- *Murphy v. Nickels & Dimes, Inc.*, Winn. Cnty. Cir. Ct. Case No. 2022-LA-0000112 (Aug. 16, 2023) (granting final approval of class action settlement of Illinois biometric privacy claims for a class comprised of 293 individuals who were required to use biometric timekeeping equipment and naming Mr. Richards class counsel).

Recent Trials:

Lead Counsel

- *Epsilantis v. Scozzari Roof Services Contracting & Consulting, et. al.* S.D. Fla. Case No. 2:21-cv-10195-AMC (Sept. 8, 2023) (jury verdict returned for plaintiff in FLSA overtime and minimum wage lawsuit after 2.5 years of contested litigation where Mr. Richards served as lead counsel and Mr. Miller served as second chair).

Our Attorneys:

Jordan Richards, Owner/Founder

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Mr. Richards is the owner and founder of USA Employment Lawyers. Jordan specializes his practice in wage and hour claims arising under the Fair Labor Standards Act (“FLSA”) and biometric privacy claims arising under the Illinois Biometric Information Privacy Act (“BIPA”). Mr. Richards has been admitted to practice law in Florida (2014), Illinois (2018), and New York (2021). Additionally, Mr. Richards is admitted to practice in the following federal jurisdictions: United States District Court for the Southern District of Florida, the United States District Court for the Middle District of Florida, the United States District Court for the Northern District of Florida, the United States District Court for Northern District of Illinois, the United States District Court for the Central District of Illinois, the United States District Court for the Southern District of Illinois, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, the United States District Court for the District of Colorado, the United States District Court for the District of New Mexico, the United States District Court for the Southern District of Texas, the Eleventh Circuit Court of Appeals, and the United States Supreme Court. Mr. Richards is a member in good standing in each of these bars, and has also appeared *pro hac vice* in the United States District Court for the Northern District of Georgia, the United States District Court for the Northern District of California, the United States District Court for the District of Connecticut, the United States District Court for the Eastern District of North Carolina, the United States District Court for the Western District of Pennsylvania and the United States District Court for the Eastern District of Kentucky.

Mr. Richards represents employees in a variety of industries including the restaurant and hospitality industry, telecommunications industry, transportation industry, sales industry, and various other industries. Mr. Richards also investigates manufacturers of biometric devices and whether these companies comply with disclosure and consent requirements. Mr. Richards has been named a Super Lawyers Rising Star every year since 2020 and has also received an AV-Preeminent rating from Martindale Hubbell in both the Peer Review and Judicial categories. Mr. Richards has been appointed as class counsel in dozens of class and collective action cases throughout the country.

Prior to entering private practice, Mr. Richards served as a prosecutor with the State Attorney’s Office for the 17th Judicial Circuit in Broward County, Florida. During this time, he handled hundreds of criminal and juvenile cases, and successfully tried more than a dozen cases against some of the state’s top trial attorneys.

Jordan earned his law degree from the Benjamin N. Cardozo School of Law at Yeshiva University in New York City. While at Cardozo Law School, Jordan interned for the Hon. Arlene Bluth in the Supreme Court for the State of New York. During this time, he also interned with a New York City-based talent manager, the Brooklyn District Attorney’s Office, and the in-house counsel for SAG-AFTRA. Jordan holds a Bachelor of Fine Arts degree in Musical Theatre from Catawba College in Salisbury, North Carolina.

Michael Miller, Senior Attorney

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Mr. Miller represents employees in class, collective, and individual actions to recover unpaid minimum and overtime wages. Mr. Miller has represented clients in a variety of industries including the restaurant and hospitality industry, the health insurance industry, automobile industry, and medical transportation industry. Mr. Miller has been a member of the Florida Bar for over 15 years and is also admitted to practice in New York and New Jersey. Mr. Miller is also admitted in the following federal jurisdictions: United States District Court for the Southern District of Florida, the United States District Court for the Middle District of Florida, the United States District Court for the Northern District of Florida, the United States District Court for Northern District of Illinois, the United States District Court for the Southern District of New York, and the United States District Court for the District of New Jersey. Mr. Miller is a member in good standing in each of these bars, and has also appeared *pro hac vice* in the United States District Court for the Western District of Pennsylvania.

Mr. Miller's extensive experience in complex litigation has yielded him a proven record of success in both federal and state courts. His prior experience representing businesses and employers provides unique insights into management. Since joining USA Employment Lawyers, Mr. Miller has been named class counsel in several class and collective action lawsuits throughout the United States.

Prior to joining USA Employment Lawyers, Mr. Miller worked in boutique law firms in South Florida representing businesses in wage and hour, discrimination, whistleblower, trade secrets, and breach of employment contract claims. Mr. Miller has represented clients in hundreds of cases.

Sarah Schaefer, *Associate Attorney*

Ms. Schaefer specializes in early case investigation for claims arising in class, collective, and individual lawsuits related to unpaid minimum wages, and overtime wages. Sarah earned her Bachelor of Arts degree in Criminal Justice with a minor in Political Science from Temple University in Philadelphia, Pennsylvania. Sarah earned her Juris Doctorate from Nova Southeastern University Shepard Broad College of Law in Davie, Florida. In law school, Ms. Schaefer earned various academic honors, including the Dean's List for Academic Achievement and serving as Editor for the ILSA Journal of International and Comparative Law, which led to one of her articles being published in the ILSA Journal of International and Comparative Law.

Sarah spent her final year of law school clerking with USA Employment Lawyers where she gained practical experience working on class action wage and hour matters. Previously, Sarah interned with the Honorable Stacey Schulman in the 17th Judicial Circuit in the State of Florida.

Ms. Schaefer was admitted to the Florida Bar in 2023 and is also admitted to practice in the United States District Court for the Southern District of Florida.

Charles McGee, *Law Clerk*

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Mr. McGee earned his Juris Doctorate from Florida International University College of Law in May 2016. In law school, Mr. McGee was a member of the National Black Law Students Association (NBLSA) where he served as the Pre-Law Co-Director for the Southern Region in 2015 and 2016. Mr. McGee also served as the President of the H.T. Smith Black Law Students Association (BLSA) in Spring 2016. Prior to attending law school, Mr. McGee earned a Bachelor of Criminal Justice from Florida Memorial University where he graduated in August 2013 *magna cum laude*.

Mr. McGee focuses his work at USA Employment Lawyers on assisting in legal research, discovery, and data review in complex employment class action cases. Mr. McGee has prior experience working at law firms in South Florida and Georgia. Additionally, in law school, Mr. McGee interned in the summer of 2015 with the Hon. Patrick A. White in the United States District Court for the Southern District of Florida.





Angely Mercader Coste, Legal Assistant & Intake Specialist

Ms. Mercader Coste is licensed to practice law in the Dominican Republic and has prior legal experience handling matters in commercial law, corporate law, foreign investments, and other complex civil matters. Before moving to the United States, Ms. Mercader Coste worked as an associate attorney for 5 years for Oficina De Law Cruz Alvarado Abogados. Prior to that, she worked in the office of general counsel for Magycorp Business Group, where she advised and assisted the Human Resources department in labor law matters and contracting. At USA Employment Lawyers, Ms. Mercader Coste performs a variety of roles including legal assistant and intake specialist where she works with clients and compiles evidence to support actionable claims under federal and state law. Ms. Mercader Coste's prior legal experience allows her to provide exceptional service to clients and enables her to communicate efficiently and effectively.

Activities Export

08/02/2024



11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
08/02/2024		Edit: Draft Declaration of Jordan Richards in Support of Joint Motion for Approval of FLSA. Settlement. Compiled exhibits to Declaration.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.00h	\$235.00	-	\$235.00
08/01/2024		Prepare: Prepared and formatted signed settlement agreements to be sent to opposing counsel.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
07/31/2024		Correspondence: Correspondence with Stockinger; review individual agreements  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
07/25/2024		Correspondence: Correspondence and review of individual agreements  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.84h	\$395.00	-	\$331.80
07/23/2024		Teleconference: Teleconferences with clients about individual settlement agreements  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.84h	\$395.00	-	\$331.80
07/22/2024		Draft: Draft Motion for Approval and review individual agreements  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.59h	\$395.00	-	\$1,023.05
07/16/2024		Teleconference: Teleconference with clients  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.42h	\$395.00	-	\$165.90
07/15/2024		Teleconference: Teleconference	01012-Lorenzo	Michael	0.50h	\$395.00	-	\$197.50
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024








11:48 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		with opposing counsel ● Unbilled	FLSA Plaintiff	Miller				
07/09/2024		Teleconference: Teleconference with Christine Stockinger ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.59h	\$395.00	-	\$233.05
07/02/2024		Teleconference: Phone call with William Miller to discuss current status of settlement. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.14h	\$235.00	-	\$32.90
06/28/2024		Teleconference: Call with client to discuss current status of case. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
06/26/2024		Correspondence: Correspondence about plan to obtain approval of settlement ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
06/25/2024		Draft: Draft and research Motion in Limine ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.42h	\$395.00	-	\$165.90
06/25/2024		Review: Review of order denying motion for reconsideration; correspondence with opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.34h	\$395.00	-	\$529.30
06/24/2024		Teleconference: Call with John Belloise ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/24/2024	 Unbilled	Teleconference: Call with William Miller	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
06/24/2024	 Unbilled	Teleconference: Spoke briefly with client William Miller regarding current status of settlement approval documentation.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.07h	\$235.00	-	\$16.45
06/21/2024	 Unbilled	Draft: Draft and research Motion for Reconsideration	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.75h	\$395.00	-	\$1,086.25
06/20/2024	 Unbilled	Draft: Draft Motion for Reconsideration	01012-Lorenzo FLSA Plaintiff	Michael Miller	4.34h	\$395.00	-	\$1,714.30
06/20/2024	 Unbilled	Correspondence: Replied to Opt-in Plaintiff John Belloise's text message requesting an update.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
06/20/2024	 Unbilled	Edit: Added citations to Lochren and BVN 16, LLC order to Motion for Reconsideration.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.27h	\$235.00	-	\$63.45
06/19/2024	 Unbilled	Westlaw Research: Research for motion for reconsideration	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.34h	\$395.00	-	\$529.30
06/18/2024	 Unbilled	Westlaw Research: Research Lochnen Cases and orders cited by judge	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.84h	\$395.00	-	\$1,121.80
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

11:48 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
06/18/2024	🕒	Teleconference: Tc with opposing counsel re: Denial Order ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.50h	\$395.00	-	\$197.50
06/18/2024	🕒	Review: Review order denying motion for amended approval; meeting with partner ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.84h	\$395.00	-	\$331.80
06/17/2024	🕒	File: File and prepare exhibits for Amended Motion ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.75h	\$395.00	-	\$296.25
06/17/2024	🕒	Compile: Prepared fully executed Class/Collective Settlement Agreement for filing. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
06/14/2024	🕒	Correspondence: Correspondence with opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
06/13/2024	🕒	Correspondence: Correspondence with opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
06/13/2024	🕒	Review: Review revised fee declaration ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
06/13/2024	🕒	Edit: Revised declaration and exhibits in support of motion for final approval of class AND	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
					291.05h		\$0.00	\$90,307.50
							0.00h	291.05h

Activities Export

08/02/2024

11:48 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		collective settlement agreement. ● Unbilled						
06/12/2024	🕒	Draft: Draft tolling agreement; revisions to documents' review amendments from opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.84h	\$395.00	-	\$726.80
06/12/2024	🕒	Sent: Sent amended settlement agreement to client via adobe e-sign. Advised client of same via text message. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.10h	\$235.00	-	\$23.50
06/11/2024	🕒	Draft: Amend Documents based on information form Teleconference with opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.09h	\$395.00	-	\$825.55
06/10/2024	🕒	Draft: Teleconference with opposing counsel and amendment of settlement documents ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.17h	\$395.00	-	\$857.15
06/07/2024	🕒	Teleconference: Teleconference with opposing counsel about order denying motion to approve ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.59h	\$395.00	-	\$233.05
06/06/2024	🕒	Finalize: Finalize settlement documents for filing ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.75h	\$395.00	-	\$1,086.25
06/06/2024	🕒	Compile: Prepared Class	01012-Lorenzo	Sarah	0.67h	\$235.00	-	\$157.45
					291.05h		\$0.00	\$90,307.50
							0.00h	291.05h

Activities Export

08/02/2024

11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Settlement Agreement and the Individual Settlement Agreements for filing. ● Unbilled	FLSA Plaintiff	Schaefer				
06/05/2024	🕒	Review: Review and compile all settlement documents; review revisions ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	3.09h	\$395.00	-	\$1,220.55
06/05/2024	🕒	Compile: Compiled and organized Exhibits 1-3 in Exhibit B (Declaration in Support of Motion for Approval) to Motion for Approval for FLSA Settlement Class. Ensured Exhibit B was ready for filing. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
06/04/2024	🕒	Review: Review and revise fee declaration and exhibits ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.84h	\$395.00	-	\$726.80
06/04/2024	🕒	Correspondence: Correspondence with claims administrator about revised estimate ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.42h	\$395.00	-	\$165.90
06/04/2024	🕒	Draft: Drafted AO 133 - Exhibit 3 to Declaration of Jordan Richards in Support of Motion for Approval (Bill of Costs). ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.10h	\$235.00	-	\$23.50
06/04/2024	🕒	Compile: Compiled exhibit 2 to	01012-Lorenzo	Sarah	0.34h	\$235.00	-	\$79.90
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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11:48 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Declaration of Jordan Richards in Support of Joint Motion for Approval of Class Settlement. Redacted attorney-client privileged material from Iodestar. ● Unbilled	FLSA Plaintiff	Schaefer				
06/04/2024	🕒	Draft: Drafted initial draft of Declaration of Jordan Richards in Support of Joint Motion for Approval of Class Settlement. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.67h	\$235.00	-	\$392.45
06/04/2024	🕒	Sent: Sent class settlement agreement to client for signature and advised client of same via text message. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.14h	\$235.00	-	\$32.90
06/03/2024	🕒	Review: Review revised agreement sent by opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.67h	\$395.00	-	\$264.65
06/03/2024	🕒	Review: Review changes to settlement documents; research FLSA release in Rule 23 cases ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.09h	\$395.00	-	\$825.55
06/02/2024	🕒	Correspondence: Followed up with client via text message regarding the individual settlement agreement for additional consideration. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/02/2024		Sent: Resent individual settlement agreement to Mr. Lorenzo for signature.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
05/31/2024		Correspondence: Correspondence about updated quote from claims administrator  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
05/31/2024		Westlaw Research: teleconference and research about FLSA release  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.34h	\$395.00	-	\$529.30
05/31/2024		Review: Review and have executed the individual settlement agreements  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.75h	\$395.00	-	\$296.25
05/31/2024		Review: Review order to show cause issues by court  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.17h	\$395.00	-	\$67.15
05/31/2024		Sent: Spoke with William Miller via telephone to discuss his Supplemental Individual Settlement Agreement and General Release. Sent text messages to Julian Lorenzo and John Belloise to discuss their Supplemental Individual Settlement Agreements and General Releases. Sent agreements to Mr. Lorenzo, Mr. Miller, and Mr. Belloise via Adobe E-sign.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
05/30/2024	🕒	Review: Review updates of settlement documents sent by opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.67h	\$395.00	-	\$1,054.65
05/30/2024	🕒	Review: Teleconference with opposing counsel and continue revisions ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.84h	\$395.00	-	\$331.80
05/29/2024	🕒	Review: Teleconference with opposing counsel and review revisions to settlement documents ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.75h	\$395.00	-	\$296.25
05/24/2024	🕒	Review: Review prior representations about amount of hours; correspondence with opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
05/21/2024	🕒	Correspondence: Sent text message to John Belloise to provide requested update. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
05/16/2024	🕒	Teleconference: Spoke with Zachary Durham and provided update. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.07h	\$235.00	-	\$16.45
05/14/2024	🕒	Meeting: Meeting re: Settlement Documents Revision	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.09h	\$395.00	-	\$825.55
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
05/13/2024	🕒	Meeting: Meeting re: Revisions to Settlement Documents ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.50h	\$395.00	-	\$592.50
05/10/2024	🕒	Westlaw Research: Research 216(b) collective component of Rule 23 settlement ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.92h	\$395.00	-	\$363.40
05/10/2024	🕒	Draft: Draft Notice Packet and Proposed Order ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	3.09h	\$395.00	-	\$1,220.55
05/10/2024	🕒	Correspondence: Spoke with William Miller via telephone to advise of current status of settlement. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
05/09/2024	🕒	Draft: Draft settlement documents ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.09h	\$395.00	-	\$825.55
05/08/2024	🕒	Draft: Draft and revise settlement documents ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	3.09h	\$395.00	-	\$1,220.55
05/07/2024	🕒	Review: Initial review of settlement agreement ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.67h	\$395.00	-	\$659.65
05/07/2024	🕒	Draft: Draft Motion for Approval of Settlement and Order of Dismissal	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.59h	\$395.00	-	\$1,023.05
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024









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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
04/29/2024	🕒	Correspondence: Correspondence re: Settlement Paperwork ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
04/26/2024	🕒	Draft: Draft Joint Notice of Settlement ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
04/25/2024	🕒	Review: Review mediation report; being joint motion for approval ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.59h	\$395.00	-	\$628.05
04/24/2024	🕒	Review: Review settlement documents ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.92h	\$395.00	-	\$363.40
04/24/2024	🕒	Review: Reviewed and edited settlement term sheet. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Jordan Richards	0.75h	\$395.00	-	\$296.25
04/23/2024	🕒	Review: Review proposed Term Sheet ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.84h	\$395.00	-	\$331.80
04/22/2024	🕒	Review: Review the Court's procedures for settlement after mediation ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
04/19/2024	🕒	Teleconference: Teleconference with clients about settlement ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.50h	\$395.00	-	\$197.50
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/18/2024	 Unbilled	Attend: Attendance at mediation	01012-Lorenzo FLSA Plaintiff	Michael Miller	6.00h	\$395.00	-	\$2,370.00
04/18/2024	 Unbilled	Attend: Attended final part of mediation.	01012-Lorenzo FLSA Plaintiff	Jordan Richards	1.00h	\$395.00	-	\$395.00
04/17/2024	 Unbilled	Prepare: Mediation preparation and research	01012-Lorenzo FLSA Plaintiff	Michael Miller	3.67h	\$395.00	-	\$1,449.65
04/17/2024	 Unbilled	Intake: Conducted initial intake for Jean Paul Figueroa and sent him e-mail request for supporting documentation.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
04/16/2024	 Unbilled	Correspondence: Continue correspondence with claims administrator and review of estimate	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
04/15/2024	 Unbilled	Calculate: Correspondence for claims administrator quote; perform damage calculation for mediation	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.75h	\$395.00	-	\$691.25
04/12/2024	 Unbilled	Teleconference: tc with client re: mediation	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
04/11/2024	 Unbilled	Teleconference: Teleconference with William Miller	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.59h	\$395.00	-	\$233.05
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
04/11/2024	🕒	Review: Review of additional discovery documents produced ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.84h	\$395.00	-	\$331.80
04/11/2024	🕒	Finalize: Finalize mediation summary and calculate damages for mediation ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.09h	\$395.00	-	\$825.55
04/11/2024	🕒	Calculate: Re-calculated 80/20 claim damages based on new information provided by Opt-in Plaintiff Christine Stockinger. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.67h	\$235.00	-	\$157.45
04/11/2024	🕒	Teleconference: Phone call with Opt-in Plaintiff to discuss current status of case and hours of operation of the restaurant. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
04/11/2024	🕒	Calculate: Calculated 80/20 damages for Christine Stockinger. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.95h	\$235.00	-	\$223.25
04/11/2024	🕒	Review: Reviewed and revised Mediation Case Summary. Included 80/20 calculations for 3 Plaintiffs. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.78h	\$235.00	-	\$183.30
04/11/2024	🕒	Calculate: Continued calculating 80/20 claim damages for Plaintiffs	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.25h	\$235.00	-	\$528.75
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Lorenzo, Miller, and Belloise. ● Unbilled						
04/10/2024		Draft: Draft, review, and revise mediation summary ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.84h	\$395.00	-	\$1,121.80
04/10/2024		Calculate: Reviewed clock in and out records and began calculating Plaintiffs' 80/20 claim damages. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.00h	\$235.00	-	\$470.00
04/10/2024		Compile: Organized documentation produced by Defendant according to each plaintiff. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.50h	\$235.00	-	\$352.50
04/10/2024		Continued: Continued and finished initial draft of Mediation Case Summary. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.00h	\$235.00	-	\$235.00
04/09/2024		Draft: Revise proposed term sheet ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.75h	\$395.00	-	\$296.25
04/09/2024		Review: Review draft of mediation summary ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.75h	\$395.00	-	\$296.25
04/09/2024		Review: Review discovery documents served by Defendant ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.09h	\$395.00	-	\$825.55
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/09/2024		Draft: Continued drafting Case Summary for mediation. Focused on memorandum of law sections (legal issues and procedural history/Plaintiff's experience working for Defendants sections). ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.00h	\$235.00	-	\$470.00
04/09/2024		Review: Reviewed documentation produced by Defendant. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.59h	\$235.00	-	\$138.65
04/09/2024		Draft: Continued drafting case summary for mediation. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.09h	\$235.00	-	\$491.15
04/08/2024		Review: Review correspondence about class mediation and compare to discovery responses ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.59h	\$395.00	-	\$233.05
04/08/2024		Review: Review discovery responses ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.25h	\$395.00	-	\$493.75
04/08/2024		Review: Reviewed Defendant's responses to Plaintiff's Requests for Production of Individual and Class Data. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
04/08/2024		Draft: Began drafting Mediation Case Summary. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.80h	\$235.00	-	\$423.00
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/04/2024		Review: Review of discovery needed for mediation  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.67h	\$395.00	-	\$264.65
04/03/2024		Review: Reviewed Scheduling Order at D.E. 23.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.34h	\$235.00	-	\$79.90
04/01/2024		Review: Review discovery order  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.17h	\$395.00	-	\$67.15
04/01/2024		Review: Review deadlines in scheduling order  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
04/01/2024		Draft: Input Ordered Calendared Order from Judge.  Unbilled	01012-Lorenzo FLSA Plaintiff	Charles McGee	0.50h	\$175.00	-	\$87.50
03/28/2024		Finalize: Revise and file Joint Scheduling Report and Proposed Scheduling Order  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.34h	\$395.00	-	\$529.30
03/25/2024		Draft: Draft proposed term sheet for mediation  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.59h	\$395.00	-	\$628.05
03/25/2024		Review: Review deadlines; correspondence with opposing counsel  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
03/22/2024		Review: Reviewed S.D. Fla. Local Rules for mediation.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
03/19/2024	🕒	Review: Reviewed D.E. 19 - ORDER denying without prejudice [14] Motion to Certify Class; granting [17] Motion to Stay and ensured dates were notated properly. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
03/18/2024	🕒	File: File Joint Motion to Stay and Motion for Mediation ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.92h	\$395.00	-	\$363.40
03/15/2024	🕒	Review: Review documents from opt-in Essick ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.67h	\$395.00	-	\$264.65
03/15/2024	🕒	Review: Review orders issued by Court ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
03/14/2024	🕒	Correspondence: Finalize scheduling mediation and correspondence with opposing counsel and mediator ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.17h	\$395.00	-	\$462.15
03/13/2024	🕒	Draft: Draft Joint Motion to Stay and Proposed Order ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.09h	\$395.00	-	\$430.55
03/13/2024	🕒	Correspondence: Correspondence about mediation ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.50h	\$395.00	-	\$197.50
					291.05h		\$0.00	\$90,307.50
							0.00h	291.05h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/12/2024	 Unbilled	File: File notice for opt-in plaintiff	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
03/12/2024	 Unbilled	Correspondence: Spoke with Opt-in Plaintiff William Miller via telephone and provided case update.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
03/11/2024	 Unbilled	Intake: Conducted initial intake for Mark Essick. Sent him e-mail request for supporting documentation and sent him the Consent to Sue form via Adobe e-sign.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.81h	\$235.00	-	\$190.35
03/06/2024	 Unbilled	Continued: Continued compiling case law for affirmative defenses conferral.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.00h	\$235.00	-	\$470.00
03/05/2024	 Unbilled	Compile: Drafted Notice of Filing Consent to Sue for 3 Opt-in Plaintiffs. Formatted Consent to Sue forms for 3 Opt-ins for filing with CM/ECF.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.44h	\$235.00	-	\$103.40
03/05/2024	 Unbilled	Continued: Continued drafting conferral e-mail re: striking Defendant's affirmative defenses.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.57h	\$235.00	-	\$368.95
03/04/2024	 Unbilled	Finalize: Conduct Rule 26(f)	01012-Lorenzo	Michael	2.17h	\$395.00	-	\$857.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Conference; finalize and file Motion for Conditional Certification ● Unbilled	FLSA Plaintiff	Miller				
03/04/2024	🕒	Westlaw Research: Researched case law for striking affirmative defenses in FLSA cases and drafted conferral e-mail with relevant case law for 8 out of 15 Affirmative Defenses. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.25h	\$235.00	-	\$528.75
03/04/2024	🕒	Review: Reviewed Motion for Conditional Certification to ensure it was ready for filing. Finalized and formatted Exhibits D, E, and F for filing. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.40h	\$235.00	-	\$329.00
03/04/2024	🕒	Format: Formatted declarations in support of Motion for Conditional Cert. for filing. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
03/01/2024	🕒	Finalize: Finalize and serve case management documents; correspondence with opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
02/29/2024	🕒	Draft: Reviewed Court Order and drafted Proposed Scheduling Order ● Unbilled	01012-Lorenzo FLSA Plaintiff	Charles McGee	1.50h	\$175.00	-	\$262.50
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/29/2024		Draft: Reviewed Court Order and drafted Plaintiffs' Early Rule 34 Request for Production of Class Data Defendant.  Unbilled	01012-Lorenzo FLSA Plaintiff	Charles McGee	0.75h	\$175.00	-	\$131.25
02/29/2024		Draft: Reviewed Court Order and drafted Plaintiffs' Early Rule 34 Request for Production to Defendant.  Unbilled	01012-Lorenzo FLSA Plaintiff	Charles McGee	1.00h	\$175.00	-	\$175.00
02/29/2024		Draft: Drafted Notice of 2200 Restaurant Partners, LLC's Corporate Representative Deposition with Areas of Inquiry (Date TBD).  Unbilled	01012-Lorenzo FLSA Plaintiff	Charles McGee	1.25h	\$175.00	-	\$218.75
02/29/2024		Review: Review Plaintiffs Motion for Conditional Certification and Declarations.  Unbilled	01012-Lorenzo FLSA Plaintiff	Charles McGee	2.17h	\$175.00	-	\$379.75
02/29/2024		Review: Review service email and finalized documents for Rule 26(f) Conference  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.42h	\$395.00	-	\$165.90
02/29/2024		Review: Reviewed FRCP and Local Rules for any additional case management required filings.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.11h	\$235.00	-	\$25.85
02/29/2024		Finalize: Finalized all	01012-Lorenzo	Sarah	0.87h	\$235.00	-	\$204.45
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		documentation to be sent to opposing counsel with case management correspondence packet. Edited Requests for Production, Joint Scheduling Report, and Proposed Scheduling Order. Discussed with lead counsel Mr. Miller strategy moving forward re: motion for conditional certification. ● Unbilled	FLSA Plaintiff	Schaefer				
02/29/2024	🕒	Westlaw Research: Correspondence with opposing counsel; research on served offer of judgments prior to filing motion for conditional certification ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.67h	\$395.00	-	\$659.65
02/29/2024	🕒	Review: Edit Case Management Documents ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.84h	\$395.00	-	\$331.80
02/28/2024	🕒	Draft: Drafted Plaintiff's Rule 26(a) Initial Disclosures. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Charles McGee	1.50h	\$175.00	-	\$262.50
02/28/2024	🕒	Draft: Review Court Scheduling Order and Draft Proposed Joint Scheduling Report. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Charles McGee	2.00h	\$175.00	-	\$350.00
02/28/2024	🕒	Draft: Review Court Scheduling Order and Draft Case Management Correspondence.	01012-Lorenzo FLSA Plaintiff	Charles McGee	1.50h	\$175.00	-	\$262.50
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
02/28/2024	🕒	Edit: Reviewed and revised Plaintiff's Rule 26(a) Initial Disclosures drafted by paralegal Mr. McGee. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.34h	\$235.00	-	\$79.90
02/28/2024	🕒	Review: Reviewed and edited Plaintiff's Early Rule 34 Request for Production of Class/Collective Data to Defendant and Plaintiff's Early Rule 34 Request for Production of Documents to Defendant drafted by paralegal Mr. McGee. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
02/28/2024	🕒	Edit: Reviewed and edited Notice of Taking Corporate Representative for Defendant's In-Person Deposition drafted by paralegal Mr. McGee. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.34h	\$235.00	-	\$79.90
02/28/2024	🕒	Edit: Reviewed and edited Proposed Joint Scheduling Report and Proposed Discovery Report drafted by paralegal Mr. McGee. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.05h	\$235.00	-	\$246.75
02/28/2024	🕒	Review: Reviewed and edited Case Management Correspondence letter drafted by paralegal Mr. McGee.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.50h	\$235.00	-	\$117.50
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
02/27/2024	🕒	Meeting: Meeting on the case management conference documents ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
02/26/2024	🕒	Draft: Email opposing counsel and revise motion for conditional certification citations ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.84h	\$395.00	-	\$726.80
02/23/2024	🕒	Correspondence: Spoke with opt-in Plaintiff Zachary Durham re: claims in the lawsuit and [REDACTED]. Re-sent consent to sue form and reviewed signed consent to sue form. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
02/22/2024	🕒	Review: Review answer and affirmative defenses; research sufficiency of affirmative defenses ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.84h	\$395.00	-	\$726.80
02/22/2024	🕒	Review: Reviewed Answer and Affirmative Defenses. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
02/21/2024	🕒	Meeting: Meeting re: Opting in additional plaintiffs ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.42h	\$395.00	-	\$165.90
02/21/2024	🕒	Correspondence: Followed up with opt-in Plaintiff Zachary Durham on	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		supporting documentation and consent to sue form. ● Unbilled						
02/21/2024	🕒	Review: Continued reviewing opt-in Plaintiff Christine Stockinger's paystubs and timesheets. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.75h	\$235.00	-	\$176.25
02/20/2024	🕒	Review: Review documents received by opt-in plaintiff ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.17h	\$395.00	-	\$67.15
02/20/2024	🕒	Review: Review Dune handbook ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.59h	\$395.00	-	\$233.05
02/20/2024	🕒	Teleconference: Teleconference with opt-in plaintiff ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.42h	\$395.00	-	\$165.90
02/20/2024	🕒	Review: Began reviewing Opt-in Plaintiff Christine Stockinger's paystub documentation. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.34h	\$235.00	-	\$79.90
02/20/2024	🕒	Correspondence: Spoke via telephone with Opt-in Plaintiff Zachary Durham. Sent e-mail request for supporting documentation and sent consent to sue form via adobe e-sign. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
02/20/2024	🕒	Correspondence: Spoke with Opt-in Plaintiff Christine Stockinger re:	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.14h	\$235.00	-	\$32.90
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		consent to sue form, [REDACTED] [REDACTED] and pay documentation. ● Unbilled						
02/20/2024	🕒	E-mail: Replied to Christine Stockinger's e-mail question re: consent to sue form. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
02/20/2024	🕒	Intake: Conducted initial intake for Opt-in Plaintiff Christine Stockinger. Sent her e-mail request for supporting documentation and sent her consent to sue form. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.59h	\$235.00	-	\$138.65
02/19/2024	🕒	Correspondence: Discussed potential opt-in Plaintiff Zach Durham's claims with Lead Counsel Michael Miller. Sent e-mail request for supporting documentation to Mr. Durham and requested phone call. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
02/16/2024	🕒	Edit: Revised Exhibit F to Motion for Conditional Certification. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.82h	\$235.00	-	\$192.70
02/15/2024	🕒	Correspondence: Spoke with Opt-in Plaintiff William Miller via telephone and provided an update on case.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
02/14/2024	🕒	Edit: Began editing Motion for Conditional Certification to align with Declaration of John Belloise. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.39h	\$235.00	-	\$326.65
02/13/2024	🕒	Review: Check citations and paperwork for motion for conditional certification ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.17h	\$395.00	-	\$462.15
02/13/2024	🕒	Edit: Began editing Motion for Conditional Certification to align with Declaration of William Miller. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.30h	\$235.00	-	\$305.50
02/12/2024	🕒	Correspondence: Sent text message correspondence to Opt-in Plaintiff John Belloise requesting time sheets and/or clock-in and clock-out records. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
02/12/2024	🕒	E-mail: Sent e-mail request for supporting documentation to potential opt-in Matthew Hartmann. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
02/12/2024	🕒	Correspondence: Spoke with potential opt-in Matthew Hartmann. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.49h	\$235.00	-	\$115.15
02/12/2024	🕒	Continued: Continued and finished drafting Proposed Order on Motion	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.51h	\$235.00	-	\$119.85
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		for Conditional Certification. ● Unbilled						
02/12/2024		Edit: Began editing Motion for Conditional Certification to align with Declaration of Julian Lorenzo. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.76h	\$235.00	-	\$648.60
02/12/2024		Review: Reviewed paystubs sent by opt-in John Belloise. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.27h	\$235.00	-	\$63.45
02/10/2024		Review: Conducted brief review of paystub information sent by John Belloise. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
02/10/2024		Correspondence: Replied to text message correspondence from Opt-in Plaintiff John Belloise. Advised him to please send paystub documentation for attorney review. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
02/09/2024		Review: Review executed declaration of John Belloise ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
02/09/2024		Review: Review motion for extension of time and correspondence from partner concerning phone call with opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/09/2024		Edit: Updated declaration of John Belloise per my discussion with opt-in Belloise.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.41h	\$235.00	-	\$96.35
02/09/2024		Correspondence: Spoke with Opt-in Plaintiff John Belloise re: declaration and claims and opt-in Plaintiff's questions and  .  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.59h	\$235.00	-	\$138.65
02/09/2024		Draft: Began drafting proposed order for motion for conditional certification.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.00h	\$235.00	-	\$235.00
02/09/2024		Met with Lead Counsel Mr. Miller to discuss John Belloise's declaration.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
02/09/2024		Meeting: Discussed claims with Senior Attorneys Mr. Richards and Mr. Miller. Followed up with opt-in John Belloise on declaration.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
02/08/2024		Followed up with Opt-in John Belloise re: signature on declaration in support of motion for conditional certification.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
02/07/2024		Correspondence: Followed up on	01012-Lorenzo	Sarah	0.09h	\$235.00	-	\$21.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		declarations sent to Mr. Lorenzo and Mr. Belloise for execution. ● Unbilled	FLSA Plaintiff	Schaefer				
02/07/2024	🕒	Edit: Updated Motion for Conditional Certification pursuant to discussions with Opt-in Plaintiffs. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.50h	\$235.00	-	\$117.50
02/07/2024	🕒	Correspondence: Spoke with Zachary Durham (potential opt-in and witness) regarding claims alleged and current pay and work policies at the restaurant. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.84h	\$235.00	-	\$197.40
02/07/2024	🕒	Correspondence: Spoke with Mr. Lorenzo to finalize declaration. Spoke with Opt-in Reilman to finalize declaration. Spoke with both about claims and Defendant's wage and side work policies. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.75h	\$235.00	-	\$176.25
02/07/2024	🕒	Correspondence: Followed up with Mr. Lorenzo and Mr. Belloise on phone call scheduled for today. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
02/06/2024	🕒	Review: Review signed declaration of William Miller ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.67h	\$395.00	-	\$264.65
02/06/2024	🕒	Correspondence: Spoke with	01012-Lorenzo	Sarah	1.00h	\$235.00	-	\$235.00
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Joseph Reilman re: declaration and supporting documentation. Reviewed supporting documentation. Conferred with Lead Counsel to discuss strategy moving forward due to new information. ● Unbilled	FLSA Plaintiff	Schaefer				
02/06/2024	🕒	Correspondence: Called and sent follow up text message to Julian Lorenzo requesting he call us back for declaration. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.04h	\$235.00	-	\$9.40
02/06/2024	🕒	Edit: Revised Motion for Conditional Certification to ensure we did not go over 20-page limit. Cut down on unnecessary language and repetitive case cites. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.75h	\$235.00	-	\$411.25
02/06/2024	🕒	Draft: Drafted Exhibit G - Reminder Notice Cover Page for Motion for Conditional Certification. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
02/06/2024	🕒	Correspondence: Sent text message correspondence to opt-in Plaintiffs Miller and Belloise advising [REDACTED]. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/06/2024		Draft: Drafted Exhibit E to Motion for Conditional Certification (Legal Notice for Posting at Company).  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
02/06/2024		Draft: Drafted Exhibit E to Motion for Conditional Certification.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.00h	\$235.00	-	\$235.00
02/05/2024		Review: Review correspondence with clients and draft of declarations  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.67h	\$395.00	-	\$264.65
02/05/2024		Correspondence: Spoke with Joseph Reilman re: company handbook.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.10h	\$235.00	-	\$23.50
02/05/2024		Edit: Continued revising Declaration of Joseph Reilman pursuant to opt-in Plaintiff's requests.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.22h	\$235.00	-	\$51.70
02/05/2024		Correspondence: Spoke with Joseph Reilman re: declaration and made changes pursuant to opt-in plaintiff's request. Discussed with opt-in claims we are alleging and sent e-mail to opt-in re: employee handbook we received from Defendant.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.39h	\$235.00	-	\$91.65
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
02/05/2024		Edit: Revised Declaration of John Belloise in Support of Motion for Conditional Certification pursuant to phone call with Mr. Belloise. Sent to opt-in Plaintiff Belloise for review and execution.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.00h	\$235.00	-	\$235.00
02/05/2024		Correspondence: Sent text message to Joseph Reilman to advise we sent him his declaration for review and signature.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
02/05/2024		Finalize: Finalized Declaration of Joseph Reilman in Support of Motion for Conditional Certification and sent to opt-in Plaintiff Reilman for execution.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.50h	\$235.00	-	\$117.50
02/05/2024		Finalize: Finalized Declaration of William Miller in Support of Motion for Conditional Certification and sent to opt-in Plaintiff Miller for execution.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.31h	\$235.00	-	\$307.85
02/05/2024		Correspondence: Spoke via telephone with John Belloise re: Declaration in Support of Motion for Conditional Certification.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.85h	\$235.00	-	\$199.75
02/05/2024		Draft: Began drafting Notice of Collective Action and Opportunity	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.50h	\$235.00	-	\$117.50
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		to Join (exhibit to Motion for Conditional Certification). ● Unbilled						
02/02/2024		Continued: Continued revising Declaration of Joseph Reilman in Support of Motion for Conditional Certification. Conferred with Senior Attorney about the claims of the case and strategy for [REDACTED] [REDACTED] [REDACTED] ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.76h	\$235.00	-	\$178.60
02/02/2024		Teleconference: Call with opt-in Plaintiffs regarding company policies ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
02/02/2024		Correspondence: Spoke with Joseph Reilman re: his declaration in support of motion for conditional certification. Began drafting his declaration in accordance with Opt-in Plaintiff Reilman's responses. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.50h	\$235.00	-	\$117.50
02/02/2024		Edit: Began revising Motion for Conditional Certification, specifically sections that discuss the declarations in support. Reviewed case citations for proper format. Included short cites where necessary.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.75h	\$235.00	-	\$411.25
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
02/02/2024	🕒	Correspondence: Followed up with Opt-in Plaintiff John Belloise on declaration in support of motion for conditional cert. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
02/02/2024	🕒	Draft: Continued drafting Declaration of John Belloise in Support of Motion for Conditional Certification. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.52h	\$235.00	-	\$357.20
02/01/2024	🕒	Draft: Began drafting Declaration of John Belloise in Support of Motion for Conditional Certification. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.75h	\$235.00	-	\$176.25
02/01/2024	🕒	Draft: Continued editing and revising Declaration of William Miller. Conducted in depth review of remainder of time records for opt-in Plaintiff. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.50h	\$235.00	-	\$587.50
02/01/2024	🕒	Correspondence: Phone call with William Miller to discuss allegations and statements in declaration in support of motion for conditional certification. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.67h	\$235.00	-	\$157.45
02/01/2024	🕒	Investigate: Investigated Defendant's hours of operation	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		from opening year and 2nd year of business. ● Unbilled						
02/01/2024		Draft: Continued drafting Declaration of William Miller. Conducted review of opt-in Plaintiff's time records and paystubs. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
02/01/2024		Correspondence: Texted Plaintiff and both Opt-in Plaintiffs (Miller and Belloise) re: phone call to finalize declaration in support of motion for conditional certification. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.12h	\$235.00	-	\$28.20
01/31/2024		Draft: Revise Motion for Conditional Certification ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.84h	\$395.00	-	\$726.80
01/31/2024		Teleconference: teleconference with William Miller ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
01/31/2024		Correspondence: Correspondence with opposing counsel ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
01/31/2024		Draft: Began drafting Declaration of William Miller in Support of Motion for Conditional Certification. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/31/2024		Draft: Drafted Declaration of Julian Lorenzo in Support of Motion for Conditional Certification.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.16h	\$235.00	-	\$507.60
01/31/2024		Meeting: Meeting with Senior Attorneys Mr. Miller and Mr. Richards re: conditional certification motion and collectives alleged.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.50h	\$235.00	-	\$117.50
01/31/2024		Correspondence: Spoke with Joseph Reilman (potential opt-in) about the case and next steps in joining. Sent consent to sue form to him via Adobe E-sign.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.24h	\$235.00	-	\$56.40
01/31/2024		Draft: Finished drafting motion for conditional certification. Sent to Lead Attorney for review.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.60h	\$235.00	-	\$611.00
01/30/2024		Meeting: Meeting with associate attorney re: Drafting Declarations for Motion for Conditional Certification  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.84h	\$395.00	-	\$331.80
01/30/2024		File: Review and file Consents to Sue; correspondence with opposing counsel  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.50h	\$395.00	-	\$197.50
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/30/2024		Client Meeting: Client meeting with Plaintiff to go over declaration in support of motion for conditional certification.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.51h	\$235.00	-	\$119.85
01/30/2024		Continued: Continued drafting Motion for Conditional Certification. Researched case law on "meal periods" and "hours worked" under the predominant benefit test.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.39h	\$235.00	-	\$561.65
01/30/2024		Correspondence: Sent consent to sue form for John Belloise to opposing counsel.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
01/30/2024		Review: Reviewed Opt-in Plaintiff John Belloise's amended consent to sue form and organized for filing.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
01/30/2024		Correspondence: Followed up with John Belloise on amended consent to sue form.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
01/29/2024		Prepare: Prepared Notices of Filing Consent to Sue for Representative Plaintiff and two opt-in Plaintiffs. Prepared Consents to Sue for filing as exhibits.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/29/2024		Correspondence: Spoke with William Miller regarding current status of case [REDACTED] [REDACTED] Answered questions about lawsuit. Reviewed his paystubs.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.39h	\$235.00	-	\$91.65
01/26/2024		Correspondence: Followed up with potential opt-in Joseph Reilman re: consent to sue form & additional information.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
01/26/2024		Continued: Continued drafting Motion for Conditional Certification (Memorandum of Law section).  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
01/26/2024		Review: Reviewed D.E. 6 and made note of deadlines pursuant to FRCP & S.D. Fla. Local Rules.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.65h	\$235.00	-	\$152.75
01/24/2024		Continued: Continued drafting Memorandum of Law section on Motion for Conditional Certification.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
01/24/2024		Correspondence: Followed up with Joseph Reilman via text re: consent to sue form & additional questions relevant to claims.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
01/22/2024		Correspondence: Followed up with	01012-Lorenzo	Sarah	0.09h	\$235.00	-	\$21.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		potential opt in Joseph Reilman. ● Unbilled	FLSA Plaintiff	Schaefer				
01/22/2024	🕒	Correspondence: Called & L/m for Joseph Reilman (potential opt-in). ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.04h	\$235.00	-	\$9.40
01/19/2024	🕒	Correspondence: Responded to Joseph Reilman's text message and scheduled phone call with opt-in. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.05h	\$235.00	-	\$11.75
01/19/2024	🕒	Review: Reviewed and filed affidavit of service as to Defendant. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Jordan Richards	0.09h	\$395.00	-	\$35.55
01/19/2024	🕒	Correspondence: Followed up with Joseph Reilman via text message. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
01/19/2024	🕒	Continued: Continued drafting Memorandum of law section (d) and (e) of Motion for Conditional Certification. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.01h	\$235.00	-	\$237.35
01/18/2024	🕒	Continued: Finished drafting Memorandum of Law Section III(d) in the Motion for Conditional Certification. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.84h	\$235.00	-	\$432.40
01/18/2024	🕒	Correspondence: Re-sent Opt-in Plaintiff John Belloise Consent to	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.07h	\$235.00	-	\$16.45
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Sue form. ● Unbilled						
01/18/2024		Correspondence: Spoke to opt-in Plaintiff John Belloise via telephone. Answered questions regarding consent to sue form and discussed employee handbook. Provided him with insight as to next steps of case. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
01/18/2024		Draft: Began drafting Section IV (Notice section) and continued drafting Memorandum of Law Section III(c) through (d). ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.00h	\$235.00	-	\$470.00
01/18/2024		E-mail: Replied to client's e-mail regarding proper dates for the consent to sue form and employee handbook. Provided a brief status update on case. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
01/18/2024		Edit: Revised Plaintiff's consent to sue form per Plaintiff's request (he entered in wrong years of employment). ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
01/17/2024		Review: Review orders issued by the Court ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

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Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/17/2024		Review: Reviewed Court's Orders in D.E. 5 (Notice to Parties in FLSA Cases) and D.E. 6 (Order Requiring Counsel to Meet, File Joint Scheduling Report, and Joint Discovery Report). Made note of specific deadlines in D.E. 6 and set reminder to revisit D.E. 6 when Defendant files a responsive pleading.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.12h	\$235.00	-	\$28.20
01/17/2024		Draft: Began drafting Memorandum of Law section in Motion for Conditional Certification, including Section III(a) through (c).  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.60h	\$235.00	-	\$376.00
01/17/2024		Draft: Drafted Section 2 II Part A(iv) through (vi) of Motion for Conditional Certification.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.59h	\$235.00	-	\$373.65
01/17/2024		Draft: Drafted Section 2 II Part A(ii) and (iii) of Motion for Conditional Certification.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.75h	\$235.00	-	\$176.25
01/17/2024		Correspondence: Followed up with potential opt-in Joseph Reilman. Requested phone call with him.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
01/17/2024		Draft: Drafted Section 2 II Part A(i) of Motion for Conditional Certification.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.09h	\$235.00	-	\$491.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
01/16/2024	🕒	Continued: Continued drafting Motion for Conditional Certification. Focused on Facts section. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.50h	\$235.00	-	\$117.50
01/16/2024	🕒	Draft: Began drafting outline for Motion for Conditional Certification. Began drafting the Motion and focused on Introduction and Summary of Argument. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.25h	\$235.00	-	\$528.75
01/16/2024	🕒	Correspondence: Followed up with Plaintiff re: consent to sue form and employee handbook. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.05h	\$235.00	-	\$11.75
01/16/2024	🕒	Correspondence: Spoke with John Belloise via telephone to discuss consent to sue form, employee handbook, and next steps (conditional certification). Sent consent to sue form via Adobe E-sign and sent him the employee handbook requesting additional information regarding same. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
01/15/2024	🕒	Review: Review the consent to sue forms executed by the collective ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.17h	\$395.00	-	\$67.15
01/15/2024	🕒	Correspondence: Called, L/m, and	01012-Lorenzo	Sarah	0.10h	\$235.00	-	\$23.50
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024














11:48 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		sent e-mail to Joseph Reilman (opt-in) to provide update on case. Spoke with Opt-in John Belloise and scheduled phone call for tomorrow. ● Unbilled	FLSA Plaintiff	Schaefer				
01/15/2024	🕒	E-mail: E-mailed Plaintiff to advise we sent him the consent to sue for signature. Sent Plaintiff employee handbook. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.11h	\$235.00	-	\$25.85
01/15/2024	🕒	Correspondence: Spoke to Plaintiff via telephone to update him on status of case. Advised case has been filed and that we are sending consent to sue form. Spoke with him [REDACTED] ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.05h	\$235.00	-	\$11.75
01/12/2024	🕒	Review: Review revised consent to sue forms to send to collective ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.17h	\$395.00	-	\$67.15
01/12/2024	🕒	Teleconference: telephone conference with William Miller re: handbook provided by Defendant ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.25h	\$395.00	-	\$98.75
01/12/2024	🕒	Draft: Finalize and file Complaint ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.34h	\$395.00	-	\$134.30
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024







11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
01/12/2024		Correspondence: Sent consent to sue form to William Miller via Adobe E-sign and e-mailed him to advise of same.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
01/12/2024		Edit: Revised consent to sue form to include case number and additional collectives alleged in Complaint (off-the-clock collective & overtime collective).  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
01/12/2024		Correspondence: Spoke with William Miller on the phone with lead attorney Michael Miller re: recent updates to case and next steps.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.32h	\$235.00	-	\$75.20
01/11/2024		Draft: Prepare outline for Motion for Conditional Certification  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.50h	\$395.00	-	\$592.50
01/11/2024		Review: Proofread complaint for filing; review provided handbook  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.59h	\$395.00	-	\$233.05
01/10/2024		Edit: Revised complaint to assert willfulness more specifically. Reviewed S.D. Fla. case law on willfulness under the FLSA.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.43h	\$235.00	-	\$336.05
01/09/2024		Draft: Review and revise drat	01012-Lorenzo	Michael	0.67h	\$395.00	-	\$264.65
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		complaint ● Unbilled	FLSA Plaintiff	Miller				
01/05/2024		Review: Correspondence with Defendant, review of provided handbook; research on applicability of unsigned class waiver ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.00h	\$395.00	-	\$790.00
01/05/2024		E-mail: Replied to William Miller's e-mail re: employee handbook. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.05h	\$235.00	-	\$11.75
01/05/2024		Correspondence: Sent employee handbook to William Miller and requested any additional supporting documentation he has in his possession. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
01/05/2024		Correspondence: Spoke via telephone with William Miller re: supporting documentation and employee handbook. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
01/05/2024		Correspondence: Sent e-mails and called client and opt-ins to discuss supporting documentation from employment at Dune. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.29h	\$235.00	-	\$68.15
01/05/2024		Review: Reviewed employee handbook and searched 2200	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

















11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Restaurant Partners LLC on Pacer and State Court case searches. ● Unbilled						
01/04/2024	🕒	Teleconference: tc with Defendant and review of client documents ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.75h	\$395.00	-	\$296.25
01/02/2024	🕒	Review: Reviewed and revised Complaint. Reviewed pertinent case law pertaining to off-the-clock work and unpaid meal periods. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.42h	\$235.00	-	\$568.70
12/29/2023	🕒	Review: Review revisions to the complaint ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.59h	\$395.00	-	\$628.05
12/29/2023	🕒	Westlaw Research: Research mandatory meal break issue ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.09h	\$395.00	-	\$825.55
12/29/2023	🕒	Draft: Revised complaint and counts/allegations concerning off-the-clock work/compensable meal periods; researched DOL regulations and binding case law in 11th Circuit for off-the-clock work/compensable meal period claims ● Unbilled	01012-Lorenzo FLSA Plaintiff	Ahava Livingstone	3.40h	\$150.00	-	\$510.00
12/28/2023	🕒	Draft: Research overtime violation based on unpaid meeting; revise complaint ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	2.17h	\$395.00	-	\$857.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024



11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/27/2023		Draft: Revise compliant; research overtime issue; review documents provided by opt-in  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.84h	\$395.00	-	\$726.80
12/21/2023		Westlaw Research: Research overtime issue created by forced lunch hour by Defendant  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.17h	\$395.00	-	\$462.15
12/21/2023		Review: Continue review and revision of complaint  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.34h	\$395.00	-	\$529.30
12/19/2023		Review: Review draft of complaint  Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	1.50h	\$395.00	-	\$592.50
12/19/2023		Correspondence: Spoke with client via telephone to provide requested update. Advised client of process moving forward and case strategy.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.07h	\$235.00	-	\$16.45
12/19/2023		Prepare: Prepared proposed summons.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
12/19/2023		Finalize: Finalized complaint for Mr. Miller's review.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.84h	\$235.00	-	\$432.40
12/18/2023		Continued: Continued revising complaint.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.84h	\$235.00	-	\$432.40
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024








11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/18/2023	 Unbilled	Edit: Began revising complaint.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.51h	\$235.00	-	\$354.85
12/15/2023	 Unbilled	Edit: Began reviewing/revising/ editing first draft of Complaint.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
12/15/2023	 Unbilled	Draft: Drafted Count VII of the Complaint.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.00h	\$235.00	-	\$235.00
12/15/2023	 Unbilled	Draft: Drafted Count VI of the Complaint.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.52h	\$235.00	-	\$122.20
12/15/2023	 Unbilled	Draft: Drafted Count V of the Complaint.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.67h	\$235.00	-	\$157.45
12/15/2023	 Unbilled	Continued: Continued and finished drafting Count IV of the Complaint.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
12/15/2023	 Unbilled	Edit: Revised Complaint up to Count 4.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.24h	\$235.00	-	\$291.40
12/14/2023	 Unbilled	Draft: Began drafting Count IV of Complaint.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
12/14/2023	 Unbilled	Draft: Drafted Count III of the Complaint.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.12h	\$235.00	-	\$263.20
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024








11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
12/13/2023		Correspondence: Spoke with opt-in/class member William Miller re: status of case. Advised him that we will send him a consent to sue form when we file the complaint.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
12/12/2023		Continued: Began drafting Count I and Count II of the Complaint.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.17h	\$235.00	-	\$274.95
12/12/2023		Continued: Continued drafting complaint. Revised Parties Section. Began drafting Defendant Requires Bartenders And Barbacks To Spend More Than 30 Continuous Minutes On Non-Tipped Duties And Side Work During Each Shift, Class Allegations, and OT allegations Sections of the complaint.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.50h	\$235.00	-	\$352.50
12/12/2023		Continued: Continued drafting class/collective action complaint. Added one collective to "Parties" Section. Drafted Jurisdiction & Venue, FLSA Coverage, Defendant Failed To Provide Bartenders And Barbacks With Sufficient Notice Of The Tip Credit, and Defendant Requires Plaintiff And All Other Bartenders And Barbacks To Spend More Than 20% Of The Workweek On Non-Tipped Duties And Side Work	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	2.54h	\$235.00	-	\$596.90
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024







11:48 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		sections of the complaint. ● Unbilled						
12/11/2023		Draft: Began drafting Class/ Collective Action Complaint. Specifically focused on introduction and parties section. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.04h	\$235.00	-	\$244.40
12/11/2023		Meeting: Spoke with Managing Partner Mr. Richards re: consent to sue form and drafting complaint. Revised consent to sue form per Mr. Richards' request. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
12/08/2023		Prepare: Drafted consent to sue form for Mr. Miller's review. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.64h	\$235.00	-	\$150.40
12/08/2023		Review: Review and revise demand letter ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.67h	\$395.00	-	\$264.65
12/08/2023		Meeting: Discussed demand letter with Mr. Miller and discussed client documentation. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
12/07/2023		Finalize: Finalized demand letter for Mr. Miller's review. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.78h	\$235.00	-	\$183.30
11/30/2023		Review: Reviewed all payroll documents and timesheets for	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.30h	\$235.00	-	\$305.50
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

11:48 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		William Miller's employment period at DUNE. ● Unbilled						
11/28/2023		Review: Began reviewing all payroll documents from PNC William Miller. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.30h	\$235.00	-	\$70.50
11/28/2023		Correspondence: Spoke with opt-in William Miller re: TOAST documentation. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.10h	\$235.00	-	\$23.50
11/28/2023		Intake: Conducted initial intake for William Miller and sent e-mail request for supporting documentation. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.67h	\$235.00	-	\$157.45
11/22/2023		Meeting: Meeting with associate counsel about opt-in plainitffs and demand letter ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.67h	\$395.00	-	\$264.65
11/22/2023		Intake: Conducted initial intake for Joseph Reilman and sent e-mail request for supporting documentation. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.60h	\$235.00	-	\$141.00
11/22/2023		Intake: Conducted initial intake for John Belloise (opt-in for DUNE). Sent e-mail requesting supporting documentaiton.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.44h	\$235.00	-	\$103.40
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Unbilled						
11/20/2023	🕒	Continued: Continued drafting demand letter. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.59h	\$235.00	-	\$373.65
11/20/2023	🕒	Correspondence: Spoke with client to get additional information on DUNE for demand letter. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.37h	\$235.00	-	\$86.95
11/17/2023	🕒	Westlaw Research: Research claims and corporate defenses ● Unbilled	01012-Lorenzo FLSA Plaintiff	Michael Miller	0.84h	\$395.00	-	\$331.80
11/16/2023	🕒	Correspondence: Sent text message to client requesting some time to speak via telephone. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
11/16/2023	🕒	Continued: Continued drafting demand letter. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	1.65h	\$235.00	-	\$387.75
11/15/2023	🕒	Meeting: Discussed Fla. Stat. § 448.110 with Managing Partner Mr. Richards. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.42h	\$235.00	-	\$98.70
11/15/2023	🕒	Draft: Began drafting demand letter (Fla. Stat. § 448.110). ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.79h	\$235.00	-	\$185.65
11/08/2023	🕒	Meeting: Attended meeting with Mr. Richards and Mr. Miller	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.10h	\$235.00	-	\$23.50
					291.05h		\$0.00	\$90,307.50
							0.00h	291.05h

Activities Export

08/02/2024















11:48 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		regarding next steps in case and strategy moving forward. ● Unbilled						
11/02/2023	🕒	Investigate: Conducted initial investigation of Defendant business (searched job postings, social media, food and beverage licenses, past lawsuits, DOL FOIA reports, Defendant website, SBA Paycheck Protection Program, google reviews). ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.50h	\$235.00	-	\$117.50
11/02/2023	🕒	Correspondence: Texted client to set up phone call. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
11/02/2023	🕒	Review: Reviewed client intake and began compiling data for claims for demand letter. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.25h	\$235.00	-	\$58.75
11/02/2023	🕒	Meeting: Met with Senior Associate Mr. Miller and discussed next steps in case. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.12h	\$235.00	-	\$28.20
11/02/2023	🕒	Begin: Finalize New Client Set Up ● Unbilled	01012-Lorenzo FLSA Plaintiff	Intake Coordinator	0.09h	\$150.00	-	\$13.50
11/02/2023	🕒	Correspondence: Followed up with client re: supporting documentation. ● Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024



11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
11/02/2023		Review: Reviewed client file and intake.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.17h	\$235.00	-	\$39.95
11/01/2023		Resent retainer to Julian Lorenzo and called client to confirm receipt.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.10h	\$235.00	-	\$23.50
11/01/2023		Correspondence: Followed up with PNC Julian Lorenzo on retainer agreement for DUNE by Laurent Tourondel case.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
10/25/2023		Correspondence: Sent retainer agreement to Julian Lorenzo for Dune Laurent Tourondel.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
10/20/2023		Correspondence: Followed up with client for supporting documentation.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
10/20/2023		Correspondence: Followed up with Julian Lorenzo regarding DUNE by Laurent Tourondel. Sent e-mail requesting supporting documentation.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
09/25/2023		Correspondence: Requested supporting documentation from client via e-mail.  Unbilled	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.09h	\$235.00	-	\$21.15
					291.05h		\$0.00 0.00h	\$90,307.50 291.05h

Activities Export

08/02/2024

11:48 AM

Date ▼	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
09/25/2023		Intake: Conducted initial intake for client's employment and DUNE by Laurent Tourondel.	01012-Lorenzo FLSA Plaintiff	Sarah Schaefer	0.39h	\$235.00	-	\$91.65
		Unbilled						
					291.05h		\$0.00	\$90,307.50
							0.00h	291.05h

UNITED STATES DISTRICT COURT

for the

_____ District of _____

v.

Case No.: _____

BILL OF COSTS

Judgment having been entered in the above entitled action on _____ against _____ ,
Date
 the Clerk is requested to tax the following as costs:

Fees of the Clerk	\$ _____
Fees for service of summons and subpoena	_____
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	_____
Fees and disbursements for printing	_____
Fees for witnesses (<i>itemize on page two</i>)	_____
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case.	_____
Docket fees under 28 U.S.C. 1923	_____
Costs as shown on Mandate of Court of Appeals	_____
Compensation of court-appointed experts	_____
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828	_____
Other costs (<i>please itemize</i>)	_____
TOTAL	\$ _____

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:

☐ Electronic service

☐ First class mail, postage prepaid

☐ Other: _____

s/ Attorney: _____

Name of Attorney: _____

For: _____ Date: _____

Name of Claiming Party

Taxation of Costs

Costs are taxed in the amount of _____ and included in the judgment.

By: _____

*Clerk of Court**Deputy Clerk**Date*

Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)

NOTICE

"Sec. 1924. Verification of bill of costs."

See also Section 1920 of Title 28, which reads in part as follows:

“A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree.”

RULE 54(d)(1)

Costs Other than Attorneys' Fees.

Unless a federal statute, these rules, or a court order provides otherwise, costs — other than attorney's fees — should be allowed to the prevailing party. But costs against the United States, its officers, and its agencies may be imposed only to the extent allowed by law. The clerk may tax costs on 14 day's notice. On motion served within the next 7 days, the court may review the clerk's action.

RULE 6

(d) Additional Time After Certain Kinds of Service.

When a party may or must act within a specified time after service and service is made under Rule5(b)(2)(C), (D), (E), or (F), 3 days are added after the period would otherwise expire under Rule 6(a).

RULE 58(e)

Cost or Fee Awards:

Ordinarily, the entry of judgment may not be delayed, nor the time for appeal extended, in order to tax costs or award fees. But if a timely motion for attorney's fees is made under Rule 54(d)(2), the court may act before a notice of appeal has been filed and become effective to order that the motion have the same effect under Federal Rule of Appellate Procedure 4(a)(4) as a timely motion under Rule 59.